

RECEIVED

MAR 03 2015

BY MAIL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
DIVISION

Joseph Antonio Heaver )

Reg. No. 1040717 )

(Enter above the full name of the )  
Plaintiff(s) in this action. Include prison )  
registration number(s). )

v. )

RONALD VAUGHN, WYLE CHANDLER )

NIKI MOODY )

THOMAS J. RANLEY, JOHN A. ROSS )

JEFFREY ERNST )

SAYLOR FLEMING )

(Enter above the full name of ALL Defend- )  
ant(s) in this action. Fed. R. Civ. P. 10(a) )  
requires that the caption of the complaint )  
include the names of all the parties. Merely )  
listing one party and "et al." is insufficient. )  
Please attach additional sheets if necessary. )

Case No. \_\_\_\_\_  
(To be assigned by Clerk)

"Jury Trial Demanded"

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

I. PLACE OF PRESENT CONFINEMENT:

Crossroads Correctional Center 1115 E. Pence Rd. Cameron MO 64429

II. PREVIOUS CIVIL ACTIONS:

- A. Have you brought any other civil actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your confinement?

YES

☒

NO

☐

- B. If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.

1. Parties to previous civil action:

Plaintiff(s): Joseph Antonio Heaver Reg. No. 1040717

Defendant(s): Ralph Sneed, Steve Larkins, Stan Payne

2. Court where filed: U.S. District Court Eastern District of Missouri

3. Docket or case number: 4:15-CV-0018-CEJ

4. Name of Judge: Honorable CAROL E JACKSON

5. Basic claim made: Medical Mistreatment / Religious  
prohibiting (denial of religious services)

6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?):

Pending

III. GRIEVANCE PROCEDURES:

- A. Is there a prisoner grievance procedure at the institution in which you are incarcerated?

YES ☒ NO ☐

- B. Have you presented this grievance system the facts which are at issue in this complaint?

YES ☐ NO ☒

C. If your answer to "B" is YES, what steps did you take: \_\_\_\_\_

D. If your answer to "B" is NO, explain why you have not used the grievance system:

The institution states that the situation doesn't apply to offender grievance.

IV. PARTIES TO THIS ACTION:

A. Plaintiff(s)

1. Name of Plaintiff: JOSEPH Antonio NEJES

2. Plaintiff's address: 115 E Pence Rd. Cameron MO 64429 (CCC)

3. Registration number: 1040717

4. Additional Plaintiff(s) and address(es): \_\_\_\_\_

B. Defendant(s)

1. Name of Defendant: Robert Smith

2. Defendant's address: 6151 Hilda Ave, #203, Dallas, TX 75236

3. Defendant's employer and job title: INTRO 2013-2014

4. Additional Defendant(s) and address(es): None

~~XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX~~

\* SEE ATTACHMENTX <sup>-3-</sup>

~~XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX~~

\*ATTACHMENT\* P. 3 cont.

## IV. PARTIES TO THIS ACTION

### B. Defendant(s)

1. Name of Defendant: Kyle Chandler
2. Defendant's address: 1200 Clark Ave. St. Louis MO 63102
3. Defendant's employer and job title: St. Louis City St. Louis Metropolitan Police Officer

1. Name of Defendant: Ronald Vaughn
2. Defendant's address: 1200 Clark Ave. St. Louis MO 63102
3. Defendant's employer & job title: St. Louis City St. Louis Metropolitan Police Officer

1. Name of Defendant: Thomas J. Frawley
2. Defendant's address: 1114 Market St. St. Louis MO 63102
3. Defendant's employer & job title: 22nd Judicial Circuit Courts Circuit Judge

1. Name of Defendant: Jeffrey Ernst
2. Defendant's address: 1114 Market St. St. Louis MO 63102
3. Defendant's employer & job title: 22nd Judicial Circuit Courts Asst. Circuit Attorney

1. Name of Defendant: Nikk Moody
2. Defendant's address: 10 N. Tucker Blvd St. Louis MO 63101
3. Defendant's employer & job title: 22nd Judicial Circuit Courts Asst. Circuit Attorney

1. Name of Defendant: Saylor Fleming
2. Defendant's address: 111 S. 10th St. 20th Fl. St. Louis MO 63101
3. Defendant's employer & job title: U.S. District Courts Eastern District of Missouri Asst. U.S. Attorney

1. Name of Defendant: John A. Ross
2. Defendant's address: 111 S. 10th St. St. Louis MO 63101
3. Defendant's employer & job title: U.S. District Courts Eastern District of Missouri U.S. District Judge

V. COUNSEL

A. Do you have an attorney to represent you in this action?

YES [ ]

NO [X]

B. If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?

YES [ ]

NO [X]

C. If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

D. If your answer to "B" is NO, explain why you have not made such efforts:

I do not have the cash to reward the cost  
of an attorney

E. Have you previously been represented by counsel in a civil action in this Court?

YES [ ]

NO [X]

F. If your answer to "E" is YES, state the attorney's name and address:

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~



VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

① Officers Kyle Chandler & Ronald Vaughn violated My 2nd Amendment Rights to the Constitution of the United States of America on or about Dec. 16th, by taking My firearms from My apartment, leaving Me defenseless against potential attack from foreign enemy aliens. ② Thomas J. Frawley violated My 10th & 9th Amendment Right by sentencing Me to 15 years Missouri D.O.C. under cause # 1022-CR03084-01, causing Me to lose My job. ③ Jeffrey Ernst violated My 9th & 10th Amendment & failed to abide by ABA Model Rule 3.8, pursuing against Me under the color of law in cause # 1022-CR03084-01, causing Me to be detained in a state prison full of violent offenders, resulting in Me being in a constant state of paranoia out of fear of getting stabbed by one of the violent offenders; I can't even peacefully sleep because My cellmate has 25 years for murder, he scares Me. ④ Nike Moody infringed on My 2nd Amendment Right by sentencing Me to 10 yrs. MO D.O.C. under cause # 1322-CR00062, causing the mother of My children to abandon Me & subsequently <sup>breaking</sup> ~~severing~~ My parental bond that I have with My daughters. ⑤ Further 2nd Amendment Violation implicates ~~SS~~ Saylor A Fleming. By Ms. Fleming failing to abide by ABA 3.8, she resulted in Me being forced out of My daughters life, due to the lengthy Federal sentence (cause # 4:13-CR-00318-JAR). John A. Ross Violated My 2nd Amendment Right by sentencing Me to 110 months in the U.S.B.O.P. under cause # 4:13-CR-00318-JAR, in which subsequently hindered My release from confinement from M.D.O.C. on 2-24-2015.

VII. RELIEF

State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a **state** prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case **must** be filed on a § 2254 form.)

I want the courts to reward Me financial  
compensation, I also want the courts to  
immediately dismiss the proceedings of cause  
no. 4:13-CR-00318-JAR

VIII. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒

NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$7 million dollars. I believe that I'm entitled to recover  
such money damage, because My rights have been infringed by state  
& federal Judicial systems, I've suffered public humiliation & My family has  
deserted ME because of the length of these sentences.

IX. Do you claim that the wrongs alleged in the complaint are continuing to occur at the present time?

YES

☒

NO

☐

Signature of attorney or pro se Plaintiff(s)

Date

2-24-2015